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April 3, 2019

VIA ECF

Honorable Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Ranieri, et al.*, 18-cr-204 (NGG) (VMS)

Dear Judge Garaufis:

Defendants respectfully write to respond to the Court's version of the questionnaire and to the government's objections and corrections filed at Dkt. 496. We have no objections or proposed changes to the questionnaire provided by the Court yesterday, although we agree with the government's correction to Question 76. Nevertheless, we have no objection to changing the wording of Question 42 to "some" rather than "many" as the government suggests, and we have no objection to adding the question proposed by the government after Question 56.

With respect to Question 61, to which the government objects, the question is not suggestive of government overreach. It merely asks the panel members a question, like many others included in the questionnaire, about their personal beliefs that could reveal a mindset which would make them positively or negatively inclined towards the defendants' theories of the case. We ask that it be included as the Court has proposed.

Respectfully submitted,

/s/

Kathleen E. Cassidy

cc: AUSAs Moira Kim Penza, Tanya Hajjar, Mark Lesko (via ECF)
All defense counsel (via ECF)